

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Kimberly Ann Glaser aka Kimberly A. Glaser aka  
Kimberly Glaser aka Kimberly A. Lamanna aka  
Kimberly Ann Montello

Debtor

Wells Fargo Bank, N. A. as Trustee for the Carrington  
Mortgage Loan Trust, Series 2007-FRE1, Asset-  
Backed Pass-Through Certificates

Movant

vs.

Kimberly Ann Glaser aka Kimberly A. Glaser aka  
Kimberly Glaser aka Kimberly A. Lamanna aka  
Kimberly Ann Montello

Debtor

William C. Miller Esq.

Trustee

**CHAPTER 13**

NO. 19-11998 MDC

11 U.S.C. Section 362

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

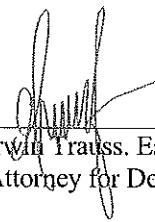
1. Debtor is current on post-petition loan payments through September 2019.
2. Debtor(s) shall maintain post-petition contractual monthly loan payments due to Movant going forward, beginning with the payment due October 1, 2019 in the amount of \$507.56.
3. In the event Movant believes that the payments under Section 2 above are not being made, the Movant may relist via Praeclipe the instant Motion for Relief hearing without the need to file a new motion.
4. Notwithstanding paragraphs two (2) and three (3) above, nothing in this Stipulation prevents Debtor from raising any and all defenses to the motion for relief that would have been available to Debtor had this stipulation not been entered into.

5. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

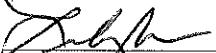
Date: \_\_\_\_\_

Date: 10/10/2019

By: \_\_\_\_\_  
Rebecca A. Solarz, Esquire

  
Irwin Trauss, Esquire  
Attorney for Debtor

Date: 10/11/19

  
William C. Miller, Esquire  
Attorney for Debtor

**NO OBJECTION**

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2019. However, the court retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge  
Magdeline D. Coleman